

I do not agree with the Commission's proposal to amend Part 97 Amateur Radio Service rules (specifically, paragraph 97.505) to grant examination credit for expired and beyond-the-grace-period-for renewal licenses.

Successfully testing for a license class does not make a person an Amateur Radio operator. The learning process begins after licensing, when a new operator can legally communicate on the bands. A new Ham is guided by his/her direct experiences on the air, as well as by receiving invaluable input from more seasoned operators, both on and off the air. This reiterative process creates good operators, and creating good operators should be the objective of the Part 97 licensing rules.

An Amateur Radio operator who maintains his/her license is more apt to have been active in the hobby over the past decade. This operator is not only maintaining a day-to-day knowledge of rules and regulations, but is using and improving the communications skills and technologies that are necessary to advance Amateur Radio and science and technology in general.

The concerns stated by the Commission are that "rules applicable to the examination credit for an expired license treat a former licensee differently than a licensee who passed the same examination(s) but continuously renewed his or her license and that the fact that an individual allowed his or her license to expire more than two years ago does not necessarily mean that the person no longer possess [sic] adequate knowledge of the subject."

I must disagree with this perception. A former licensee may have taken an exam up to 12 years previously. Within that 12 year period, this person may have never been on the air. This former licensee was given 10 years to become an active ham, and then given an opportunity to renew this status without re-testing. If s/he cannot find the time or inclination to renew a license, the chances are very good that this person has not contributed to the advancement of Amateur Radio, or even his/her own technical and communications skills within the past 10+ years.

It is my impression that, with this proposed change, the Commission is promoting growth in the quantity of operators, as opposed to promoting the quality of skills that the operators possess. As an active Amateur Radio Emergency Service participant, I can assure you that I would rather work with one quality, experienced Ham than five inexperienced former licensees who have been re-instated because they took a test 12 years ago. It is my position that examination credit for an expired license should indeed treat a former licensee differently than a licensee who passed the same examination(s) but continuously renewed, as it is currently stated in Part 97. The Commission's assumption may be correct

in that it does not necessarily mean that the person no longer possesses adequate knowledge of the subject. However, based on my experience, I believe that the Commission's assumption would only address a small percentage of former licensees, and that those individuals would more likely be an exception, not a rule.

Granted, there are exceptions to this scenario, and hardships may have forced a decent Amateur Radio operator to not renew his/her license within the appropriate time frame. If these operators have valid reasons for allowing their license to lapse, and wish to be re-instated, I believe that these requests should be considered by the Commission on a case-by-case basis.

With regard to the Commission's proposal to reduce the grace period after license expiration to six months, I agree that this is sufficient time for an Amateur Radio operator to prepare a license renewal application. Again, if a specific hardship should prevent the licensee from renewing within this grace period, s/he should have an option to petition the Commission, and these requests should be assessed on a case-by-case basis.

I am an ARRL Volunteer Examiner, and agree that the reduction in requirements from three VEs to two could effectively increase the availability of examination opportunities and not compromise the reasons the Commission decided that more than one VE is necessary. I would, however, suggest that the Commission add a recommendation that a minimum of three VEs be present for a testing session when available.

Technology has given us opportunities to communicate, learn, and teach from a distance utilizing real-time audio and video. I believe that remote observation of testing sessions by VEs is quite feasible, and should be investigated. It is my opinion that the Commission should permit this practice, and that the ARRL and VECs should work together to produce a definitive policy with documented procedures and guidelines regarding this process prior to implementation.

I agree with the Commissions proposal to amend Paragraph 97.3(c)(5) to allow emission type FXE as a phone emission, and to amend Paragraph 97.307(f)(8) to allow emission type FXD as a data emission to encourage licensees to more fully utilize TDMA technologies and promote more efficient use of our allocated spectrum.

Thank you for taking the time to consider my positions on these matters.

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